

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<div>FUJITSU LIMITED,</div> <div>PLAINTIFF</div> <div>v.</div> <div>TELLABS OPERATIONS, INC. AND TELLABS, INC.,</div> <div>DEFENDANTS.</div>	<div>CIVIL ACTION No. 09 CV 04530</div> <div><i>Complaint filed January 29, 2008</i></div> <div>JUDGE JAMES F. HOLDERMAN</div> <div>MAGISTRATE JUDGE JEFFREY COLE</div> <div>JURY TRIAL DEMANDED</div>
<div>TELLABS OPERATIONS, INC.,</div> <div>PLAINTIFF,</div> <div>v.</div> <div>FUJITSU LIMITED AND FUJITSU NETWORK COMMUNICATIONS, INC.,</div> <div>DEFENDANTS.</div>	<div>CIVIL ACTION No. 08 CV 3379</div> <div><i>Complaint filed June 11, 2008</i></div> <div>JUDGE JAMES F. HOLDERMAN</div> <div>MAGISTRATE JUDGE JEFFREY COLE</div> <div>JURY TRIAL DEMANDED</div>
<div>FUJITSU LIMITED,</div> <div>COUNTER CLAIMANT,</div> <div>v.</div> <div>TELLABS OPERATIONS, INC., TELLABS, INC., AND TELLABS NORTH AMERICA, INC.,</div> <div>COUNTER DEFENDANTS.</div>	
<div>FUJITSU NETWORK COMMUNICATIONS, INC.,</div> <div>COUNTER CLAIMANT,</div> <div>v.</div> <div>TELLABS OPERATIONS, INC.,</div> <div>COUNTER DEFENDANT.</div>	

**FUJITSU LIMITED'S MOTION FOR LEAVE TO FILE  
FIRST AMENDED COMPLAINT**

NOW COMES Fujitsu Limited ("Fujitsu"), by and through its attorney, David C. Van Dyke, and pursuant to Federal Rule of Civil Procedure 15(a)(2), respectfully requests leave to file its First Amended Complaint against Tellabs Operations, Inc., Tellabs, Inc., and Tellabs North America, Inc. (collectively "Tellabs"). In support, Fujitsu states as follows:

1. Federal Rule of Civil Procedure 15(a) and related case law holds that leave to amend a pleading must be freely given absent undue delay and undue prejudice to the opponent. *See Aliano v. Amerigas Partners, L.P.*, 2008 WL 4671716 (N.D. Ill. Oct. 22, 2008) (citing Fed. R. Civ. P. 15(a)). Granting Fujitsu's Motion will not prejudice Tellabs or delay the progress of the case in any way. (*See* Fujitsu Limited's First Amended Complaint attached hereto as Exhibit A.)

WHEREFORE, Fujitsu Limited, respectfully requests this Honorable Court enter an order granting Fujitsu Limited leave to file its First Amended Complaint against Tellabs Operation, Inc., Tellabs, Inc. and Tellabs North America, Inc.

Dated: May 6, 2011

Respectfully submitted,

By: /s/ David C. Van Dyke

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